

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

§§

V.

CIVIL ACTION NO. 6:23-cv-00321

ROY HILL, ERIC N. SHELLY,
CLEAN ENERGY TECHNOLOGY
ASSOCIATION, INC., and
FREEDOM IMPACT CONSULTING,
LLC,

§§§§§§

Defendants.

**DEFENDANT ROY HILL'S UNOPPOSED MOTION TO EXTEND DEADLINE TO
RESPOND TO RECEIVER'S MOTION**

Roy Hill (“Mr. Hill”) files this Unopposed Motion requesting this Court grant him an extension to respond to Receiver Albert C. Black III’s (“Receiver”) Motion for Instructions Concerning CETA Liquidation and Interim Distribution (“Motion”) and would show the Court as follows:

1. This Court appointed a receiver (the “Receiver”) over Mr. Hill on May 3, 2023.

[Dkt. 8].

2. Receiver filed his Motion on April 1, 2024. [Dkt. No. 75]. Mr. Hill's deadline to respond under the Federal Rules of Civil Procedure and the Local Rules for the Western District of Texas is currently April 15, 2024.

3. Mr. Hill needs additional time in order to properly prepare his response to the Motion and requests an extension until May 6, 2024. Counsel for the Receiver and the SEC do not oppose the extension.

4. This extension is not sought for the purposes of delay but so that justice may be done.

WHEREFORE, Defendant Roy Hill respectfully asks the Court for an order granting him an extension to respond to Receiver's Motion for Instructions Concerning CETA Liquidation and Interim Distribution until May 6, 2024, as described above and for such other and further relief to which he may be entitled.

Respectfully submitted,

/s/ David W. Klaudt

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ATTORNEY FOR DEFENDANT ROY HILL

CERTIFICATE OF CONFERENCE

I, David W. Klaudt, hereby certify that on the 8th day of April, 2024, I conferred with Jennifer Reece, counsel for Plaintiff, and Dennis Lynn Roosien Jr., counsel for Receiver, and they have indicated they are unopposed to the relief request in this Motion.

/s/ David W. Klaudt

David W. Klaudt

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all parties that have appeared through the Court's electronic filing system on April 9, 2024.

/s/ David W. Klaudt

David W. Klaudt